

**CHAITMAN LLP**  
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**(888) 759-1114**  
TELEPHONE & FAX

*HELEN DAVIS CHAITMAN*  
*hchaitman@chaitmanllp.com*

December 2, 2015

**VIA ECF**

The Honorable Stuart M. Bernstein  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004-1408

Re: *Picard v Wiener*, Adv. Pro. No. 10-04293  
*Picard v Wiener Fam. Ltd. Partnership*, Adv. Pro. No. 10-04323

Dear Judge Bernstein:

We write in response to the December 1, 2015 letter of Edward Jacobs, who, on behalf of Irving H. Picard as Trustee of Bernard L. Madoff Investment Securities LLC, objects to our request to be heard by the Court to resolve a discovery dispute common to the issue raised in the *Wiener* adversary proceedings and the following adversary proceedings in which this firm represents the Defendants. In each of these matters, the Trustee has provided us with Rule 45 subpoenas he intends to serve and he has deferred our requests for a meet-and-confer:

*Picard v Gunther K. Unflat*, Adv. Pro. No. 10-04293  
*Picard v. Helene Saren-Lawrence*, Adv. Pro. No. 10-04898  
*Picard v. Carol Nelson*, Adv. Pro. No. 10-04377  
*Picard v. Stanley Nelson*, Adv. Pro. No. 10-04658

We have strenuously objected to the relevance and intrusiveness of the subpoenas in the above adversary proceedings and to the request for bank records beyond the date of Mr. Madoff's arrest. Pursuant to Local Rule 7007-1, we have sought to resolve these issues through email correspondence (see, 11/10/15 emails to Marie Carlisle, Jeff Fetzer, and Alex Quimby, *et seq.*), and requested to meet and confer with opposing counsel to resolve them. However, counsel has been unavailable. (See 11/19/15 emails between Helen Chaitman and Alex Quimby).

We respectfully request to be heard on these issues when they come before the Court.

Yours respectfully,

/s/ Helen Davis Chaitman

Helen Davis Chaitman

**CHAITMAN LLP**

The Honorable Stuart M. Bernstein

December 2, 2015

Page 2

HDC:leb

Encl.

cc: *Via ECF & Email w.Encl.*  
Ernest E. Badway, Esq.  
Lauren J. Talan, Esq.  
Jimmy Fokas, Esq.

**Leslie Treff**

---

**From:** Quimby, P. Alex <aquimby@bakerlaw.com>  
**Sent:** Thursday, November 19, 2015 8:42 AM  
**To:** Helen Chaitman; Fetzer, Jeff  
**Cc:** Leslie Treff  
**Subject:** RE: Picard vs Gunther Unflat - Adv Pro No 10-05420

The subpoenas have not been served on the banks. I am on the road today and tomorrow. I'll try to touch base with you or Leslie next week. Thanks.

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**From:** Helen Chaitman [mailto:hchaitman@chaitmanllp.com]  
**Sent:** Thursday, November 19, 2015 4:56 AM  
**To:** Fetzer, Jeff  
**Cc:** Quimby, P. Alex; Leslie Treff  
**Subject:** RE: Picard vs Gunther Unflat - Adv Pro No 10-05420

Perhaps I have missed it, but I have not seen any response to my November 10 email below. I believe the subpoenas you are serving are improper and I would like to have a meet and confer so that we can raise this issue with Judge Bernstein, if you will not agree to withdraw the subpoenae. Please call my partner Leslie Treff today to arrange a time tomorrow for us to confer.

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
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---

**From:** Helen Chaitman  
**Sent:** Tuesday, November 10, 2015 5:12 PM  
**To:** Fetzer, Jeff  
**Cc:** Quimby, P. Alex  
**Subject:** RE: Picard vs Gunther Unflat - Adv Pro No 10-05420

We have the same objections to this subpoena as to the one to Dime Bank. Please let me know your position so that I can put this issue before the court, if necessary.

Helen Davis Chaitman  
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[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
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---

**From:** Fetzer, Jeff [mailto:JFetzer@bakerlaw.com]  
**Sent:** Tuesday, November 10, 2015 4:10 PM  
**To:** Helen Chaitman

**Cc:** Quimby, P. Alex

**Subject:** Picard vs Gunther Unflat - Adv Pro No 10-05420

Counsel:

We are counsel to Irving Picard in the above referenced adversary proceeding. Attached please find a copy of the Notice letter to you regarding the Trustee's intention of serving a Subpoena for Records to Honesdale National Bank. If you have any questions, please give me a call.

Jeff Fetzner

**Web site**

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**Jeffrey Fetzner**  
Paralegal  
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BakerHostetler  
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Orlando, FL 32801-3432

**BakerHostetler**

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**Leslie Treff**

---

**From:** Helen Chaitman  
**Sent:** Saturday, November 14, 2015 1:12 PM  
**To:** Carlisle, Marie L.  
**Cc:** Hunt, Dean D.; Hochmuth, Farrell; Smith, Rachel M.; Holder, Casey  
**Subject:** RE: Adv. Pro. No. 10-04898 (Helene Saren-Lawrence)

You are not permitted to take discovery to frame a complaint against subsequent transferees. I don't see any other basis for the scope of your subpoena. Precisely what information do you think you are entitled to with respect to investment transactions post-12/11/08? Let's define the issue so that we can present it to the court because it will apply to all of the cases.

Helen Davis Chaitman  
Chaitman LLP  
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---

**From:** Carlisle, Marie L. [mailto:[mcarlisle@bakerlaw.com](mailto:mcarlisle@bakerlaw.com)]  
**Sent:** Friday, November 13, 2015 5:09 PM  
**To:** Helen Chaitman  
**Cc:** Hunt, Dean D.; Hochmuth, Farrell; Smith, Rachel M.; Holder, Casey  
**Subject:** RE: Adv. Pro. No. 10-04898 (Helene Saren-Lawrence)

Helen,

The discovery sought in the noticed subpoenas falls well within the scope permitted by the Federal Rules, and we are entitled to such information under Section 4.G of Exhibit A to the November 10, 2010 Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (Dkt. 3141). If you have an objection to the subpoenas as noticed, please provide the basis for your objection so that we can consider the objection and respond as may be appropriate.

Thanks,

Marie

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**From:** Helen Chaitman [mailto:[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)]  
**Sent:** Wednesday, November 11, 2015 8:22 PM  
**To:** Carlisle, Marie L.  
**Cc:** Hunt, Dean D.; Hochmuth, Farrell; Smith, Rachel M.; Holder, Casey  
**Subject:** RE: Adv. Pro. No. 10-04898 (Helene Saren-Lawrence)

What is the basis for your seeking documents that post-date Madoff's confession? You are not entitled to take post-judgment discovery. Nor are you entitled to take discovery that would give you the ability to frame a cognizable complaint. Please tell me what legitimate reason you have for seeking any documents after December 11, 2008.



Helen Davis Chaitman  
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[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
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---

**From:** Carlisle, Marie L. [<mailto:mcarlisle@bakerlaw.com>]  
**Sent:** Wednesday, November 11, 2015 6:52 PM  
**To:** Helen Chaitman  
**Cc:** Hunt, Dean D.; Hochmuth, Farrell; Smith, Rachel M.; Holder, Casey  
**Subject:** RE: Adv. Pro. No. 10-04898 (Helene Saren-Lawrence)

Helen,

Can you please provide us the basis for your objection below?

Thanks,

Marie

---

**From:** Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]  
**Sent:** Tuesday, November 10, 2015 4:05 PM  
**To:** Holder, Casey  
**Cc:** Hunt, Dean D.; Hochmuth, Farrell; Smith, Rachel M.; Carlisle, Marie L.  
**Subject:** RE: Adv. Pro. No. 10-04898 (Helene Saren-Lawrence)

This subpoena is improper to the extent that it seeks documents post-dating December 11, 2008. Please confirm that you will revise the subpoena to limit production to documents created on or before December 11, 2008.

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
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---

**From:** Holder, Casey [<mailto:cholder@bakerlaw.com>]  
**Sent:** Tuesday, November 10, 2015 4:09 PM  
**To:** Helen Chaitman  
**Cc:** Hunt, Dean D.; Hochmuth, Farrell; Smith, Rachel M.; Carlisle, Marie L.  
**Subject:** Adv. Pro. No. 10-04898 (Helene Saren-Lawrence)

Good Afternoon,

Attached please find correspondence enclosing notice of the Trustee's intent to serve Rule 45 subpoenas in this proceeding, together with a copy of the subpoenas. Hard copies of the same have been sent to your office today via first class mail.

Best regards,  
Casey

**Casey Holder | BakerHostetler**

811 Main Street | Suite 1100 | Houston, TX 77002-6111  
T 713.276.1614 | F 713.751.1717  
cholder@bakerlaw.com

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## Lourdes Blanco

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**From:** Helen Chaitman  
**Sent:** Wednesday, December 02, 2015 3:13 PM  
**To:** Lourdes Blanco; Leslie Treff  
**Subject:** FW: APN 10-04653 - Carol Nelson - JPM Subpoena

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
Fax: (888) 759-1114

---

**From:** Smith, Rachel M. [mailto:[rsmith@bakerlaw.com](mailto:rsmith@bakerlaw.com)]  
**Sent:** Monday, August 31, 2015 2:33 PM  
**To:** Chaitman, Helen Davis <[hchaitman@bplegal.com](mailto:hchaitman@bplegal.com)>; Sirota, Valerie <[VSirota@bplegal.com](mailto:VSirota@bplegal.com)>  
**Cc:** Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)>; Hochmuth, Farrell <[FHochmuth@bakerlaw.com](mailto:FHochmuth@bakerlaw.com)>  
**Subject:** RE: APN 10-04653 - Carol Nelson - JPM Subpoena

Why don't we have a call? I have another call starting at 4:30CT/5:30 ET, but am available beforehand. Let me know what time works and at what number to reach you all.

Best regards,

Rachel

---

**From:** Chaitman, Helen Davis [mailto:[hchaitman@bplegal.com](mailto:hchaitman@bplegal.com)]  
**Sent:** Monday, August 31, 2015 10:29 AM  
**To:** Smith, Rachel M.; Sirota, Valerie  
**Cc:** Hunt, Dean D.; Hochmuth, Farrell; Chaitman, Helen Davis  
**Subject:** RE: APN 10-04653 - Carol Nelson - JPM Subpoena

The records would have to be produced in the first instance to us so that we can redact any information to which you are not entitled.

## Helen Davis Chaitman

Shareholder

Becker & Poliakoff  
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**From:** Smith, Rachel M. [<mailto:rsmith@bakerlaw.com>]  
**Sent:** Monday, August 31, 2015 11:16 AM  
**To:** Chaitman, Helen Davis; Sirota, Valerie  
**Cc:** Hunt, Dean D.; Hochmuth, Farrell  
**Subject:** APN 10-04653 - Carol Nelson - JPM Subpoena

Dear Helen and Valerie,

We have considered the two issues raised during our discussions and in your letter in connection with the Trustee's August 13, 2015 Rule 45 subpoena to JP Morgan Chase Bank. We put the subpoena on hold while we work through those issues.

While we believe the information requested is discoverable under the Rules, we understand and appreciate your concerns with respect to this account. Accordingly, we will clarify the subpoena to address both issues as shown in the attached redline and as discussed below:

1. As I clarified for Valerie on Thursday, Carol Nelson is not the holder of the designated bank account; rather, the account was held by Fiserv Trust Company. Fiserv went by several names, including, PENSICO Trust Company, Trust Industrial Bank and NTC, a defendant, previously dismissed in this case without prejudice. We expect that information related to Ms. Nelson in JP Morgan's Fiserv account will be limited to BLMIS transactions. It is transactions made to or from or for the benefit of Ms. Nelson by the dismissed defendant that are the focus of the subpoena. Thus, the revised subpoena clarifies the name of the account holder. The revisions make it clear that we are seeking documents relating to transactions between Fiserv and Ms. Nelson that may be reflected in JP Morgan's records of the Fiserv account.

2. Also, as an accommodation following my discussion with Valerie, we have revised the subpoena to limit the time period from December 11, 2006 through December 11, 2008 because information about the BLMIS transactions we are seeking through this subpoena would likely be limited to this period.

We made these revisions due to the unique nature of and relevant records likely to be found in the JP Morgan Fiserv account. This compromise does not waive or otherwise narrow the scope of our right to subpoena other third party records in this or other proceedings.

Thank you for your cooperation in working through these issues. Once you've had an opportunity to review, please confirm your agreement, so we can issue the revised subpoena and give the court a status report. We look forward to hearing from you.

Best regards,

Rachel Smith

**Rachel Smith | BakerHostetler**

811 Main Street | Suite 1100 | Houston, TX 77002-6111  
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**Lourdes Blanco**

---

**From:** Helen Chaitman  
**Sent:** Wednesday, December 02, 2015 3:14 PM  
**To:** Lourdes Blanco; Leslie Treff  
**Subject:** FW: Picard v. Nelson, Adv. Pro. No. 10-04658

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
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Fax: (888) 759-1114

---

**From:** Smith, Rachel M. [<mailto:rsmith@bakerlaw.com>]  
**Sent:** Thursday, August 27, 2015 5:16 PM  
**To:** Yavitz, Noah B. <[NBVavitz@wlrk.com](mailto:NBVavitz@wlrk.com)>; Hirschfield, Marc E. <[mhirschfield@bakerlaw.com](mailto:mhirschfield@bakerlaw.com)>; Skapof, Marc <[mskapof@bakerlaw.com](mailto:mskapof@bakerlaw.com)>; Shifrin, Maximillian S. <[mshifrin@bakerlaw.com](mailto:mshifrin@bakerlaw.com)>; Schechter, Jody E. <[jschechter@bakerlaw.com](mailto:jschechter@bakerlaw.com)>; Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)>; Forman, Jonathan A. <[jforman@bakerlaw.com](mailto:jforman@bakerlaw.com)>  
**Cc:** Chaitman, Helen Davis <[hchaitman@bplegal.com](mailto:hchaitman@bplegal.com)>; Klein, Benjamin D. <[BDKlein@wlrk.com](mailto:BDKlein@wlrk.com)>  
**Subject:** RE: Picard v. Nelson, Adv. Pro. No. 10-04658

Noah,

Please hold this subpoena in abeyance, without production, until further notice.

Best regards,

Rachel Smith

---

**From:** Yavitz, Noah B. [<mailto:NBVavitz@wlrk.com>]  
**Sent:** Tuesday, August 25, 2015 1:29 PM  
**To:** Hirschfield, Marc E.; Skapof, Marc; Shifrin, Maximillian S.; Schechter, Jody E.; Hunt, Dean D.; Smith, Rachel M.; Forman, Jonathan A.  
**Cc:** Chaitman, Helen Davis (Becker & Poliakoff); Klein, Benjamin D.  
**Subject:** Picard v. Nelson, Adv. Pro. No. 10-04658

Counsel,

Please see the attached Responses & Objections on behalf of nonparty JPMorgan Chase Bank, N.A. to the Plaintiff's subpoena in the above-captioned proceedings.

Regards,  
Noah

**Noah B. Yavitz**  
**Wachtell, Lipton, Rosen & Katz**  
51 West 52nd Street | New York, NY 10019  
(212) 403-1397 (Direct) | (212) 403-2397 (Fax)

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Thank you in advance for your cooperation and assistance.

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